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LAGOMARSINO LAW ANDRE M. LAGOMARSINO, ESQ. 3005 W. Horizon Ridge Pkwy., Suite 241 Henderson, Nevada 89052 Telephone: (702) 383-2864 Facsimile: (702) 383-0065

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

LEWIS STEWART, an individual,

aml@lagomarsinolaw.com

Attorney for Plaintiff

Plaintiff-Appellee

v.

ROMEO ARANAS; JAMES COX; FRANCISCO M. SANCHES; BRIAN E. WILLIAMS,

Defendants – Appellants,

and

///

CHERYL BURSON; S.L. CLARK; JAMES E. DZURENDA; ANGIE JONES; SEAN SU; STATE OF NEVADA

Defendants.

Case No.: 3:17-cv-00132-MMD-CLB

STIPULATION AND [PROPOSED]
ORDER TO EXTEND PLAINTIFF'S
DEADLINE TO FILE HIS REPLY TO
DEFENDANTS' OPPOSITION TO
PLAINTIFF'S MOTION TO VACATE
THE STAY PENDING DEFENDANTS'
APPEAL AND REQUEST TO CERTIFY
DEFENDANTS' APPEAL AS
FRIVOLOUS (ECF NO. 75)

(First Request)

WHEREAS Defendants Romeo Aranas, James Cox, Francisco Sanchez and Brian Williams collectively filed their opposition to Plaintiff's Motion to Vacate the Stay Pending Defendants' Appeal and Request to Certify Defendants' Appeal as Frivolous on July 15, 2020 (ECF No. 75).

Pursuant to Local Rule IA 6-1(a), the parties hereby stipulate to extend the deadline for plaintiff to file his reply to defendants' opposition. The current deadline for plaintiff to reply to defendants' opposition is **July 22, 2020**. The new deadline for plaintiff to reply to defendants' opposition will be **August 5, 2020**.

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Good cause exists because one (1) of plaintiff's associate attorneys has suddenly been quarantined due to a possible exposure to COVID-19. As a firm of only three (3) attorneys, the attorney that was tasked with drafting the reply brief has had to cover the caseload for the quarantined attorney resulting in a delay to draft reply. This unexpected coverage includes coverage for multiple depositions and deposition preparation during the seven (7) day period that would have been otherwise allocated for the drafting of a reply brief.

This extension is the first request for an extension and is not submitted for the purpose of delay.

IT IS SO STIPULATED AND AGREED.

DATED this 20th day of July, 2020.

DATED this 20th day of July, 2020.

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/s/ Andre M. Lagomarsino
Andre M. Lagomarsino, Esq. (#6711)
3005 W. Horizon Ridge Pkwy., #241
Henderson, Nevada 89052
Attorney for Plaintiff Lewis Stewart

OFFICE OF THE ATTORNEY GENERAL

_____/S/FRANK TODDRE II ______ Frank Toddre II, Esq. 555 East Washington Avenue, Suite 3900 Las Vegas, Nevada 89101 Attorney for Defendants Romeo Aranas, James Cox, Francisco Sanchez and Brian Williams

IT IS SO ORDERED.

UNITED STATES DISTRICT COURT JUDGE

DATED: July 21, 2020